

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE NATIONAL COLLEGIATE
ATHLETIC ASSOCIATION STUDENT-
ATHLETE CONCUSSION INJURY
LITIGATION**

MDL No. 2492

Master Docket No. 1:13-cv-09116

**This Documents Relates To:
All Cases**

Judge John Z. Lee

Magistrate Judge Geraldine Soat Brown

AGREED MOTION FOR EXTENSION OF TIME

Plaintiff Anthony Nichols (“Nichols”), by and through his counsel, respectfully moves the Court for a 14-day extension of time (until October 12, 2015) to file his reply brief in support of his second objection to the pending motion for preliminary approval of class settlement. (Dkt. 201.) In support of this motion, Nichols states as follows:

1. On September 14, 2015, Lead Plaintiffs and the National Collegiate Athletic Association (“NCAA”) filed responses to Nichols’ second objection to the pending motion for preliminary approval. (Dkts. 218, 222.) Together, those filings span 48 pages of briefing and, in addition, include hundreds of pages of attached exhibits.

2. Pursuant to the Court’s July 22, 2015 Order, Nichols’ reply memoranda to both filings are due on or before September 28, 2015.

3. For the Court’s convenience, Nichols is drafting a single consolidated reply brief, which he will submit in response to Lead Plaintiffs’ and the NCAA’s September 15th filings. Given the complexity of the issues and the size of the record, however, Nichols respectfully requests a 14-day extension (until October 12, 2015) to his deadline to file his reply

memorandum with the Court.

4. Nichols believes that the additional time is necessary to present the Court with the best possible record from which to evaluate the fairness of the proposed class settlement.

5. Nichols' counsel conferred with counsel for NCAA and Interim Class Counsel on September 23 and 24, 2015, respectively. Neither counsel for the NCAA nor Interim Class Counsel oppose this motion, and all agree to the requested extension.

6. Accordingly, Nichols respectfully submits that good cause exists for the requested extension and that this motion is not brought for purposes of delay.

WHEREFORE, Anthony Nichols respectfully requests a 14-day extension of time until October 12, 2015 to submit his reply memorandum in support of his second objection to the pending motion for preliminary approval of class settlement, and for such further relief as this Court deems equitable and just.

Respectfully submitted,

ANTHONY NICHOLS

By: /s/ Ari J. Scharg
One of his Attorneys

Jay Edelson
jedelson@edelson.com
Rafey S. Balabanian
rbalabanian@edelson.com
Ari J. Scharg
ascharg@edelson.com
Benjamin S. Thomassen
bthomassen@edelson.com
EDELSON PC
350 N. LaSalle, Suite 1300
Chicago, Illinois 60654
Tel: 312.589.6370
Fax: 312.589.6378

CERTIFICATE OF SERVICE

I, Ari J. Scharg, an attorney, hereby certify that on September 24, 2015, I served the above and foregoing ***Agreed Motion for Extension of Time***, by causing true and accurate copies of such paper to be filed and transmitted to all counsel of record via the Court's CM/ECF electronic filing system.

/s/ Ari J. Scharg _____